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October 24, 2024

**VIA ECF**

Honorable Dora L. Irizarry  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Kevin Campbell v. Federal Express Corporation a/k/a FedEx Express,  
and Eric Wanders, Individually*  
22 CV 7662 (DLI)(MMH)**

Your Honor:

I represent the Plaintiff in this race discrimination and retaliation lawsuit.

I write to respectfully request an extension of Plaintiff's time to submit his second brief in the summary judgment briefing schedule. I have conferred with Defendants and they do not object to this request. This is the first such request by either party for an extension of time under the currently summary judgment briefing deadlines.

The reason for this request is primarily because, sadly, about a week and a half ago one of my younger siblings died unexpectedly. As a result, I was traveling last week to see my family and am not yet quite fully back to work. This break has created a temporary (yet manageable) backlog of work, but which is going to overtake Plaintiff's current time to respond to Defendants' first filing and for which an extension in this matter is necessary. Secondly, any such extension request at this point in the year will include the intervening holidays. Given these factors, the parties have conferred and propose the following revised briefing schedule.

	<u>Original Deadline</u>	<u>Extended to</u>
Plaintiff's first filing:	September 13, 2024	Completed as scheduled.
Defendants' first filing:	October 28, 2024	November 18, 2024
Plaintiff's second filing:	December 5, 2024	January 6, 2025
Defendants second filing:	January 8, 2025	February 19, 2025
Parties Omnibus filing to the Court:	January 9, 2025	February 20, 2025

Plaintiff thanks the Court for its time and consideration.

Respectfully submitted,

*Jessica Massimi*  
JESSICA MASSIMI, Esq.